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SCIENTIFIC DATA REVIEWS  
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WASHINGTON, D.C. 20460

8/82

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MEMORANDUMOFFICE OF  
PESTICIDES AND TOXIC SUBSTANCES

TO: Lois Rossi, 2,4-D Product Manager  
Special Pesticide Review Division (TS-791)

THRU: Orville E. Paynter, Branch Chief  
Toxicology Branch  
Hazard Evaluation Division (TS-769) WSP

SUBJECT: Comment on the Note to Lois Rossi from E. Johnson, dated  
August 9, 1982.

The "typical" 2,4-D product which the 2,4-D Industry Task Force has decided to test is a 50:50 blend of the Green and Purple samples from the Task Force members.

Previously, Toxicology Branch had proposed the testing of a "worst case" material to cover all typical technicals.

In the past, the policy of testing whatever the company wishes to market has been in vogue. However, this Industry Task Force group encompasses about eight members with production processes with at least three variations to produce a technical 2,4-D acid which varies from N.D. to as high as 2.4% in some impurities.

Some of the impurities in the 2,4-D acids are dioxins of varying degrees of chlorination, the 2,7 dichlorinated molecule being the most prevalent at up to 40-plus ppb. in the Industry Task Force members samples.

S. W. Ormrod, Director of the Pesticides Division of Plant Health and Plant Products Directorate, Canada noted, Nominal values and Production Limits of 2,4-D impurities in a letter to E. Johnson dated August 19, 1982 as presented by the "Task Force".

Toxicology Branch can not reconcile values presented by Mr. Ormrod and the 2,4-D Industry Task Force samples. One might surmise that the Nominal values are those of the Canadian producers.

It is of interest to note that not one of the 2,4-D Industry Task Force member samples will theoretically pass the production limit as proposed by Canada.

On the other hand, Toxicology Branch has no toxicological objection to the limits of impurities as proposed by Canada.

The limits proposed by Canada however present problems which appear to represent areas other than purely toxicology; including at least economics, chemical detection and enforcement (memo of R. Schmitt dated September 2, 1982) and should be addressed by others than Toxicology Branch.

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Review Section I  
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*sent*  
9/17/82

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